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November 3, 2017

Federal Communications Commission
Office of the Secretary

Attn: Marlene H. Dortch, *Secretary*
445 12th St., S.W. Room TW-A325
Washington, D.C. 20554

Via Electronic filing via the internet

Subject: Credit Union National Association (CUNA) Petition for Declaratory Ruling under the Telephone Consumer Protection Act of 1991

Dear Ms. Dortch,

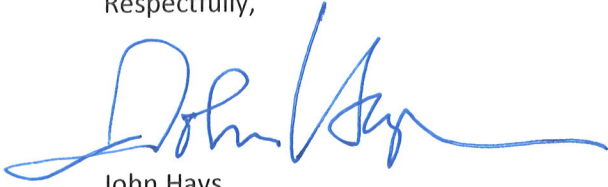
My name is John Hays and I serve as CEO of Access Community Credit Union. I am writing you on behalf of our senior team, board of directors and the 11,000 members we serve in West Texas. This comment regards the petition for declaratory ruling filed by CUNA on September 29, 2017. The petition, which we support, seeks regulatory relief from unreasonable requirements that prevent reasonable business communication with our member-owners.

While we certainly understand the intention of the Act and agree with protecting consumers, some items still warrant clarification and if left unchanged would harm credit union business relationships. We support CUNA's request that the FCC adopt an established business relationship exemption for credit unions regarding wireless informational calls, or where the call or text is in fact free, be exempt from the TCPA's prior express consent requirement for autodialed and artificial or prerecorded calls. This would help eliminate confusion between landline and wireless calls in an increasingly wireless era.

Protecting our member's privacy is a responsibility that credit unions champion, at the same time, we have a fiduciary responsibility to communicate vital and legitimate business concerns. The changes recommended would also align with Consumer Financial Protection Bureau guidance that urges financial institutions to text consumers regarding financial information. In an a rapidly evolving digital era, we would urge the commission to protect consumers by dealing with issues that involve communication with wireless devices. Not doing so would hamper our industry's ability to protect those same consumers.

We appreciate the opportunity to comment. I can be reached at jhays@accesscu.net or 806-353-9999 for further discussion.

Respectfully,

A handwritten signature in blue ink, appearing to read "John Hays", with a long, sweeping horizontal line extending to the right.

John Hays
President/CEO
Access Community Credit Union